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6 Attorneys for Defendant
7 COMCAST OF CALIFORNIA/COLORADO, LLC
[erroneously sued herein as Comcast Cable]

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 HAROLD LASHON,

11 Plaintiff,

12 vs.

13 COMCAST CABLE,

14 Defendants.
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) Case No. C10-02645 CW

) **JOINT STIPULATION AND**
) **~~PROPOSED~~ ORDER TO ENLARGE**
) **TIME TO COMPLETE FACT**
) **DISCOVERY AND HEAR CASE-**
) **DISPOSITIVE MOTIONS**

1 Plaintiff Harold LaShon ("Plaintiff") and Defendant Comcast of California/Colorado,
2 LLC (erroneously sued herein as Comcast Cable) ("Defendant") (jointly, the "Parties"), by and
3 through their undersigned counsel, hereby enter into the following Stipulation:

4 WHEREAS, the Court issued a Minute Order and Case Management Order in this action
5 on November 30, 2010 ("Case Management Order"), setting forth various deadlines for the
6 Parties to conduct discovery and scheduling the last hearing date for all case-dispositive motions;

7 WHEREAS, the Parties attended a settlement conference before the Honorable Bernard
8 Zimmerman on March 10, 2011 but were unable to reach a settlement;

9 WHEREAS, after the Parties attended the settlement conference, counsel for Defendant
10 and Plaintiff (who was proceeding *pro se*) reinitiated informal settlement discussions in April
11 and May 2011 and have been working on a proposed settlement;

12 WHEREAS, the Parties intended to finalize the terms of the proposed settlement in June
13 2011, and therefore agreed to postpone Plaintiff's deposition and to not propound further
14 discovery while the terms of the settlement agreement were finalized;

15 WHEREAS, before the Parties finalized the terms of the proposed settlement, Plaintiff
16 retained counsel;

17 WHEREAS, on June 16, 2011, Plaintiff's counsel notified defense counsel of his
18 retention by Plaintiff and requested sufficient time to familiarize himself with this action;

19 WHEREAS, due to the Parties' efforts to conserve time and resources as they explored
20 settlement and Plaintiff's recent retention of counsel, the Parties desire to extend or reschedule
21 by approximately one to two months the factual discovery deadline and dispositive motion
22 deadline set forth in the Court's Case Management Order;

23 WHEREAS, the Parties have not requested any previous time modifications in this case,
24 whether by stipulation or Court order;

25 WHEREAS, the requested time modifications will not impact the remaining deadlines set
26 forth in the Case Management Order, including the next case management conference, which is
27 scheduled for September 15, 2011, or trial, which is scheduled to begin on December 5, 2011;

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1 NOW, THEREFORE, the Parties hereby stipulate as follows:


2 1. The deadline to complete fact discovery is extended from June 30, 2011 to
3 September 1, 2011;

4 2. The last day to hear case-dispositive motions is rescheduled from
5 September 15, 2011 to October 13, 2011.


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7 IT IS SO STIPULATED.

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9 Dated: June 24, 2011

10 LAW OFFICE OF GEORGE S. KHOURY

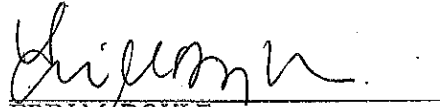
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13 GEORGE S. KHOURY

14 Attorneys for Plaintiff
15 HAROLD LASHON

16 
June 24, 2011

Dated: June 24, 2011

VALDEZ DUNSON & DOYLE LLP

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12 
13 ERIN M. DOYLE

14 Attorneys for Defendant
15 COMCAST OF
16 CALIFORNIA/COLORADO, LLC

17 PURSUANT TO STIPULATION, IT IS SO ORDERED. The parties are advised however
18 that if a motion is heard on a date so close to the trial, the pretrial and trial will likely need
19 to be continued and the new dates will be substantially delayed.

20 Dated: June 29, 2011

21 Signed:

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23 The Honorable Claudia Wilken
24 United States District Judge
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